

US EPA ARCHIVE DOCUMENT



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

DEC - 8 2011

Mr. Karl Brooks
Regional Administrator
U.S. EPA, Region VII
901 North Fifth Street
Kansas City, KS 66101

Dear Mr. Brooks:

Enclosed please find the state of Missouri's revised boundary recommendations for the 2008 Ozone National Ambient Air Quality Standard. This submittal is in response to the U.S. Environmental Protection Agency (EPA) memo dated September 22, 2011, from Gina McCarthy, Assistant Administrator regarding the ability for states to revise previously submitted boundary recommendations in light of more recent quality-assured monitoring data from 2008-2010.

In light of the most recent quality- assured monitoring data from 2008-2010, the state of Missouri is recommending the following boundary designations:

- Nonattainment – St. Louis City and St. Charles, St. Louis, Franklin and Jefferson counties;
- Attainment – Lincoln, Ste. Genevieve, Perry, Greene, Cass, Clay and Clinton counties; and
- Attainment/unclassifiable – all other counties in the state of Missouri.

This revised area boundary recommendation replaces the previous recommendation submitted on March 11, 2009. For convenience, we are also enclosing an electronic copy of the technical support documentation that was submitted along with our original recommendation. Aside from the monitoring data and the county-by-county map of our recommendation which we are now updating, the technical analysis is still valid and supportive of our current recommendation.

Enclosed with this letter is a table listing all 114 counties in Missouri and the City of St. Louis along with their corresponding recommended designations. The Missouri Air Conservation Commission adopted this revised recommendation at the December 8, 2011, commission meeting after considering the comments received during the public hearing and comment process.

Mr. Karl Brooks

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Thank you for the opportunity to revisit these recommendations due to the length of time that has elapsed since their initial submittal. If you have any questions, please contact Kyra Moore at (573) 751-7840.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES

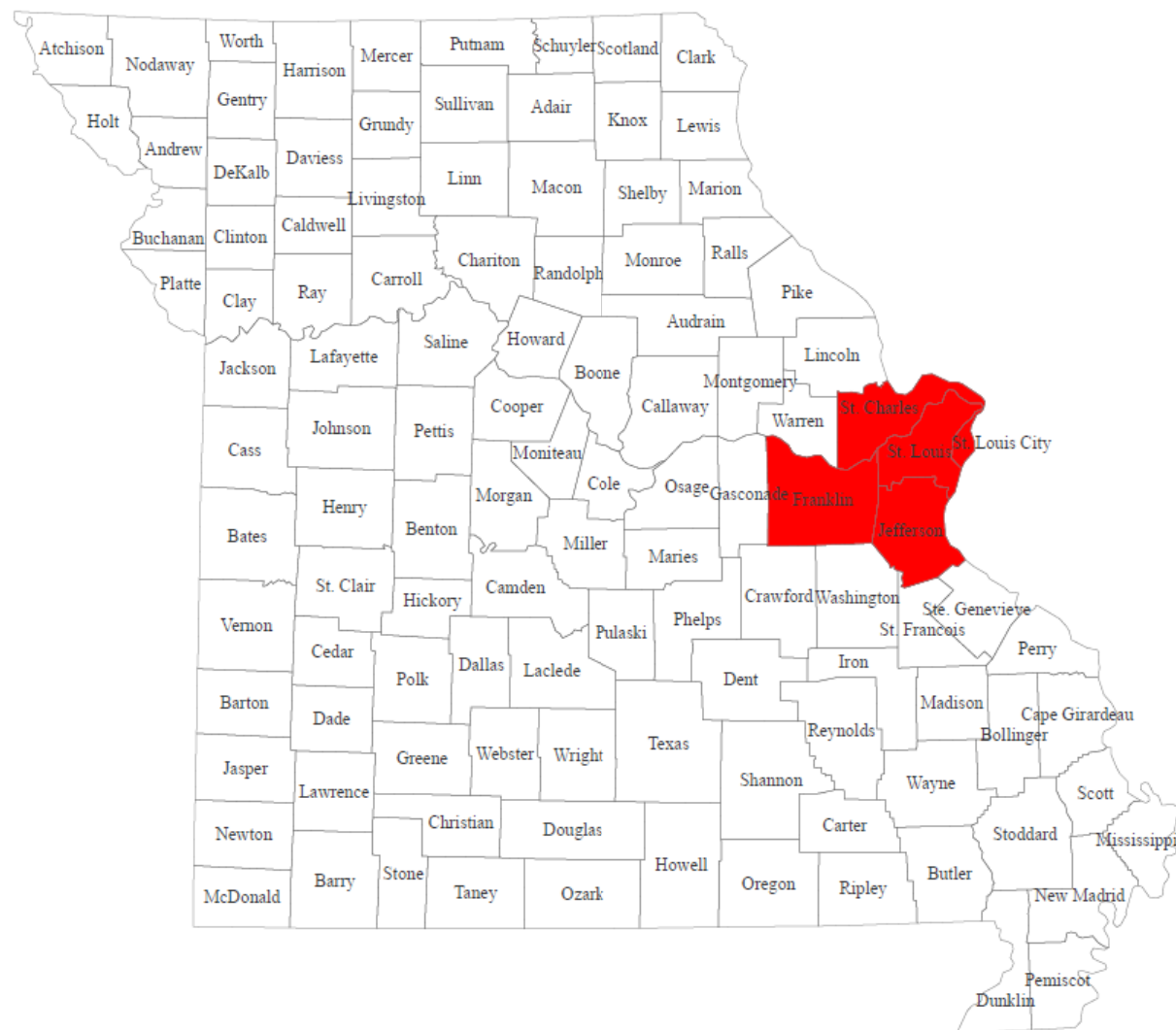


Sara Parker Pauley
Director

SPP:wvd

Enclosures

Revised 2008 Ozone Nonattainment Designation Recommendation



Missouri Department of Natural Resources
Division of Environmental Quality
Air Pollution Control Program
Prepared by Bern Johnson 23 SEP 11



Nonattainment - St. Louis

Attainment/Unclassifiable

* Based on quality assured 2008-2010
monitored ozone values

**Missouri Revised 2008 Ozone Area Designation Recommendation
September 2011**

| County | Recommended Classification |
|----------------|---------------------------------------|
| ADAIR | Attainment/unclassifiable |
| ANDREW | Attainment/unclassifiable |
| ATCHISON | Attainment/unclassifiable |
| AUDRAIN | Attainment/unclassifiable |
| BARRY | Attainment/unclassifiable |
| BARTON | Attainment/unclassifiable |
| BATES | Attainment/unclassifiable |
| BENTON | Attainment/unclassifiable |
| BOLLINGER | Attainment/unclassifiable |
| BOONE | Attainment/unclassifiable |
| BUCHANAN | Attainment/unclassifiable |
| BUTLER | Attainment/unclassifiable |
| CALDWELL | Attainment/unclassifiable |
| CALLAWAY | Attainment/unclassifiable |
| CAMDEN | Attainment/unclassifiable |
| CAPE GIRARDEAU | Attainment/unclassifiable |
| CARROLL | Attainment/unclassifiable |
| CARTER | Attainment/unclassifiable |
| CASS | Attainment |
| CEDAR | Attainment |
| CHARITON | Attainment/unclassifiable |
| CHRISTIAN | Attainment/unclassifiable |
| CLARK | Attainment/unclassifiable |
| CLAY | Attainment |
| CLINTON | Attainment |
| COLE | Attainment/unclassifiable |
| COOPER | Attainment/unclassifiable |
| CRAWFORD | Attainment/unclassifiable |
| DADE | Attainment/unclassifiable |
| DALLAS | Attainment/unclassifiable |
| DAVIESS | Attainment/unclassifiable |
| DeKALB | Attainment/unclassifiable |
| DENT | Attainment/unclassifiable |
| DOUGLAS | Attainment/unclassifiable |
| DUNKLIN | Attainment/unclassifiable |
| FRANKLIN | Nonattainment |
| GASCONADE | Attainment/unclassifiable |
| GENTRY | Attainment/unclassifiable |
| GREENE | Attainment |

| | |
|-------------|---------------------------|
| GRUNDY | Attainment/unclassifiable |
| HARRISON | Attainment/unclassifiable |
| HENRY | Attainment/unclassifiable |
| HICKORY | Attainment/unclassifiable |
| HOLT | Attainment/unclassifiable |
| HOWARD | Attainment/unclassifiable |
| HOWELL | Attainment/unclassifiable |
| IRON | Attainment/unclassifiable |
| JACKSON | Attainment/unclassifiable |
| JASPER | Attainment/unclassifiable |
| JEFFERSON | Nonattainment |
| JOHNSON | Attainment/unclassifiable |
| KNOX | Attainment/unclassifiable |
| LACLEDE | Attainment/unclassifiable |
| LAFAYETTE | Attainment/unclassifiable |
| LAWRENCE | Attainment/unclassifiable |
| LEWIS | Attainment/unclassifiable |
| LINCOLN | Attainment |
| LINN | Attainment/unclassifiable |
| LIVINGSTON | Attainment/unclassifiable |
| McDONALD | Attainment/unclassifiable |
| MACON | Attainment/unclassifiable |
| MADISON | Attainment/unclassifiable |
| MARIES | Attainment/unclassifiable |
| MARION | Attainment/unclassifiable |
| MERCER | Attainment/unclassifiable |
| MILLER | Attainment/unclassifiable |
| MISSISSIPPI | Attainment/unclassifiable |
| MONITEAU | Attainment/unclassifiable |
| MONROE | Attainment |
| MONTGOMERY | Attainment/unclassifiable |
| MORGAN | Attainment/unclassifiable |
| NEW MADRID | Attainment/unclassifiable |
| NEWTON | Attainment/unclassifiable |
| NODAWAY | Attainment/unclassifiable |
| OREGON | Attainment/unclassifiable |
| OSAGE | Attainment/unclassifiable |
| OZARK | Attainment/unclassifiable |
| PEMISCOT | Attainment/unclassifiable |
| PERRY | Attainment |
| PETTIS | Attainment/unclassifiable |
| PHELPS | Attainment/unclassifiable |
| PIKE | Attainment/unclassifiable |
| PLATTE | Attainment |
| POLK | Attainment/unclassifiable |

| | |
|----------------|---------------------------|
| PULASKI | Attainment/unclassifiable |
| PUTNAM | Attainment/unclassifiable |
| RALLS | Attainment/unclassifiable |
| RANDOLPH | Attainment/unclassifiable |
| RAY | Attainment/unclassifiable |
| REYNOLDS | Attainment/unclassifiable |
| RIPLEY | Attainment/unclassifiable |
| ST. CHARLES | Nonattainment |
| ST. CLAIR | Attainment/unclassifiable |
| ST. FRANCOIS | Attainment/unclassifiable |
| STE. GENEVIEVE | Attainment |
| ST. LOUIS | Nonattainment |
| SALINE | Attainment/unclassifiable |
| SCHUYLER | Attainment/unclassifiable |
| SCOTLAND | Attainment/unclassifiable |
| SCOTT | Attainment/unclassifiable |
| SHANNON | Attainment/unclassifiable |
| SHELBY | Attainment/unclassifiable |
| STODDARD | Attainment/unclassifiable |
| STONE | Attainment/unclassifiable |
| SULLIVAN | Attainment/unclassifiable |
| TANEY | Attainment/unclassifiable |
| TEXAS | Attainment/unclassifiable |
| VERNON | Attainment/unclassifiable |
| WARREN | Attainment/unclassifiable |
| WASHINGTON | Attainment/unclassifiable |
| WAYNE | Attainment/unclassifiable |
| WEBSTER | Attainment/unclassifiable |
| WORTH | Attainment/unclassifiable |
| WRIGHT | Attainment/unclassifiable |
| ST. LOUIS CITY | Nonattainment |

| 2008-2010 Statewide Validated Ozone Design Values | | | | | | |
|---|----------------|--------|------|-----------------------------|--|--------------|
| Site | | County | | 4th High 8-hr Average (ppb) | | Design Value |
| St. Louis | | 2008 | 2009 | 2010 | | 08-10 |
| Arnold West | Jefferson | 70 | 70 | 77 | | 72 |
| Blair Street | St. Louis City | 73 | 65 | 71 | | 69 |
| Maryland Heights | St. Louis | 69 | 70 | 76 | | 71 |
| Orchard Farm | St. Charles | 72 | 73 | 77 | | 74 |
| Pacific | St. Louis | 64 | 64 | 69 | | 65 |
| West Alton | St. Charles | 76 | 71 | 84 | | 77 |
| St. Genevieve | | | | | | |
| Bonne Terre | St. Genevieve | 71 | 69 | 72 | | 70 |
| South East | | | | | | |
| Farrar | Perry | 70 | 71 | 77 | | 72 |
| Kansas City | | | | | | |
| Liberty | Clay | 70 | 72 | 70 | | 70 |
| RG South | Cass | 66 | 64 | 67 | | 65 |
| Rocky Creek | Clay | 69 | 72 | 76 | | 72 |
| Trimble | Clinton | 70 | 75 | 76 | | 73 |
| Watkins Mill | Clay | 69 | 74 | 73 | | 72 |
| Springfield | | | | | | |
| Fellows Lake | Greene | 69 | 66 | 69 | | 68 |
| Hillcrest H.S. | Greene | 67 | 62 | 66 | | 65 |
| Outstate | | | | | | |
| El Dorado Springs | Cedar | 67 | 62 | 68 | | 65 |
| Mark Twain | Monroe | 64 | 61 | 70 | | 65 |
| Foley | Lincoln | 72 | 67 | 79 | | 72 |

Red = Violation of the 2008 NAAQS

Pursuant to 643.055 RSMo, the Missouri Air Conservation Commission has determined that this action is needed to have a U.S. Environmental Protection Agency approved State Implementation Plan.

The Revised 2008 8-Hour Ozone Standard Boundary Recommendation is hereby adopted by the Missouri Air Conservation Commission this 8th day of December, 2011.

Mark L. [Signature], Chairman

David C. Zimmermann, Vice Chairman

Sam J. [Signature], Member

Jack C. Baker, Member

Ronald [Signature], Member

_____, Member

_____, Member

**COMMENTS AND RESPONSES
AND
RECOMMENDATION FOR ADOPTION**

**PROPOSED REVISION TO
THE 2008 8-HOUR OZONE NATIONAL AMBIENT AIR QUALITY STANDARD
BOUNDARY DESIGNATION RECOMMENDATION**

On Sept. 22, 2011, the U.S. Environmental Protection Agency released a memorandum to clarify for states the status of the 2008 Ozone National Ambient Air Quality Standard. In this document, EPA explicitly stated that the current standard is 0.075 parts per million, or 75 parts per billion. EPA also announced their intentions to move forward with designations under the 2008 National Ambient Air Quality Standard, starting with the recommendations made by states in 2009, and then updating them with the most current, certified air quality data from the 2008 – 2010 monitoring period.

Based on the 2008-2010 monitoring period, Missouri is submitting a revised area boundary recommendation as an amendment to the original boundary recommendation and technical support document submitted to EPA in March 2009. This revision will recommend the following:

- Nonattainment – St. Louis City and St. Charles, St. Louis, Franklin and Jefferson counties.
- Attainment – Lincoln, Ste. Genevieve, Perry, Greene, Cass, Clay and Clinton counties.
- Attainment/unclassifiable – all other counties in the state of Missouri.

The following pages are included in the briefing document for reference:

- Statewide county by county map of the revised boundary designation recommendation
- County by county list of recommended area designation
- 2008-2010 quality assured air quality monitoring data values

The Missouri Department of Natural Resources' Air Pollution Control Program recommends the commission adopt the boundary recommendation as proposed. If the commission adopts this recommendation, it will be the department's intention to submit this recommendation to the U.S. Environmental Protection Agency.

SUMMARY OF COMMENTS: The Missouri Department of Natural Resources received three (3) comments from three (3) different sources: The Empire District Electric Company (Empire District), the Environmental Task Force of Jasper and Newton Counties (Environmental Task Force) and the Southeast Missouri Regional Planning Commission Board of Directors (SEMO Board).

COMMENT: Empire District, Environmental Task Force and the SEMO Board all expressed their support of the revised 2008 ozone boundaries as proposed. The SEMO Board formally adopted a Resolution of Support for the revised recommendations. Empire District and Environmental Task Force also commended MDNR for their support and encouragement of the development of clean air alliances across the state.

RESPONSE: Support for the revised recommendations as well as the time and effort staff has invested in outreach to affected areas of the state are greatly appreciated. No changes were made to the recommendations as a result of these comments.